

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

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UNITED STATES OF AMERICA, )  
Plaintiff, )  
v. )  
AMEREN MISSOURI, )  
Defendant. )  
\_\_\_\_\_  
)

) Civil Action No. 4:11-cv-00077-RWS  
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)

Judge Rodney W. Sippel

**UNITED STATES' CROSS-MOTION FOR A SETTLEMENT PROTECTIVE ORDER**

For the reasons set forth in the accompanying memorandum, the United States respectfully files this Cross-Motion for a Settlement Protective Order in response to Ameren's Motion for a Settlement Protective Order (ECF Doc. No. 471). Because the parties could not reach agreement on two issues, the United States cross-moves for a Settlement Protective Order containing modestly different terms. The United States' proposed Order is attached as Appendix A to its Memorandum in Support of this Motion. In addition, a redline illustrating the changes to Ameren's proposed Order is attached thereto as Exhibit B.

Pursuant to Local Rule 3.04, on several occasions the United States conferred in good faith with Ameren counsel regarding the requested relief. Despite the United States' sincere efforts to resolve this issue, counsel were unable to reach an accord.

WHEREFORE, as discussed in the accompanying memorandum in support, Plaintiff respectfully requests that the Court grant this motion and enter Plaintiff's proposed Settlement Protective Order.

Dated January 22, 2015

Respectfully submitted,

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### CERTIFICATE OF SERVICE

I hereby certify that on January 22, 2015, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will cause an electronic copy to be served on counsel of record, who are listed below:

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